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June 3, 2025

Via ECF and E-MAIL

Honorable Harvey J. Bartle III, U.S.D.J.
United States District Court for the
Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, Pennsylvania 19106



**Re: May 21, 2025 Order Regarding
The Consolidated Reply Brief in Support of Motion to Dismiss under Fed. R. Civ. P.
12(b)(6)**

***Atlas Data Privacy Corporation, et al. v. Delvepoint LLC, et al.* bearing Civil Action
No. 1:24-cv-04096-HB**

Dear Judge Bartle:

We represent defendant Delvepoint, LLC ("Delvepoint") in the Daniel's Law case in the United States District Court for the District of New Jersey assigned to your Honor captioned *Atlas Data Privacy Corporation, et al. v. Delvepoint LLC, et al.* bearing Civil Action No. 1:24-cv-04096-HB. We write pursuant to the Court's May 21, 2025 Order calling for any Consolidated Reply Brief in support of the Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6) to be filed by June 3, 2025.

We write on behalf of Delvepoint to inform the Court that Delvepoint will join in the Defendants' Consolidated Reply Brief in support of the Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6), which will be filed on or about June 3, 2025 in the matter captioned *Atlas Data Privacy Corp., et al. v. DM Group, et al.*, Civil Action No. 1:24-cv-04075-HB.

For the reasons set forth in the Consolidated Reply Brief in support of the Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6), Delvepoint requests that the Court grant the Motion and dismiss Plaintiff's Complaint with prejudice.

Respectfully submitted,

WADE CLARK MULCAHY LLP

/s/ Robert J. Cosgrove

Robert J. Cosgrove, Esq.

cc. Rajiv Parikh, Esq.